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**Pacific Western Technologies**

August 23, 1999

Mr. Donnie L. Chumbler  
Bechtel Jacobs Company LLC  
West Kentucky Technology Park  
761 Veteran Avenue  
Kevil, Kentucky 42053

Subject: **Forklift Operations**


Dear Mr. Chumbler:

Pacific Western Technologies is pleased to submit a surveillance of "Forklift Operations." This surveillance is a review of Forklift Operations in buildings C-752-B and C-746-B. The operator's performance of pre-operational inspections was observed in building C-752-B. Forklift operation and parking was observed in building C-746-B. There were two discrepancies noted in the areas reviewed.

The attached checklist and summary report was developed from PMIS-1402, Industrial Motorized Equipment and provides details of the surveillance.

If you have any questions please feel free to call me at (270) 441-5161.

Sincerely,

PWT  
  
D. R. Lamar  
Quality Engineer

Enclosure

C: Ken Campbell, PWT/OR

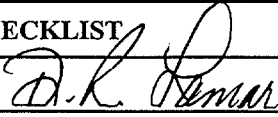

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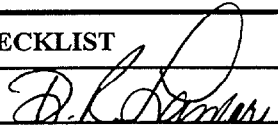

**SURVEILLANCE CHECKLIST**  
Environmental Management and Enrichment Facility

Page 1 of 4

Surveillance No.: Sur: PWT-01-99		Title: Forklift Operations			
		Ref. Documents: PMIS-1402, "Industrial Motorized Equipment Occupational Safety & Health Act (OSHA) 29CFR 1910.178(L)			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	Comments
1.	Inspection sticker affixed to vehicle indicating that the industrial motorized equipment has passed inspection.		X		Inspection stickers are no longer affixed to forklifts used to perform Bechtel Jacobs activities.
2.	Equipment/vehicle that has passed inspection is identified with a unique property number.	X			All plant owned forklifts have unique property numbers.
3.	Equipment/vehicles are inspected for defects prior to first use each day. Pre-operational inspection checklist completed. (See Appendix B or C)	X			Reference Summary Report for detailed report on leased forklifts.
4.	If equipment/vehicle is used on more than one shift, then insure that pre-operational inspection is conducted prior to first use on each shift.	X			
5.	Completed inspection checklist provided to immediate supervisor. Review file to insure that copies are being maintained for 12 months.	X			
<b>CHECKLIST</b>		<b>SURVEILLANCE</b>			
Prepared by: D. R. Lamar 		Performed by: D. R. Lamar 			
Approved by: _____ Date: _____		Approved by: _____ Date: 8/20/99			

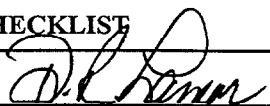
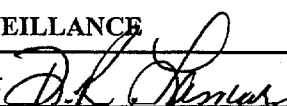
**SURVEILLANCE CHECKLIST**  
Environmental Management and Enrichment Facility

Page 2 of 4

Surveillance No.: Sur: PWT-01-99		Title: Forklift Operations			
		Ref. Documents: PMIS-1402, "Industrial Motorized Equipment Occupational Safety & Health Act (OSHA) 29CFR 1910.178(L)			
Surveillance Checklist		Surveillance Results			
Item		ACC	DEF	N/A	Comments
6.	Ensure that the following checks are performed before starting the equipment/vehicle:  <ul style="list-style-type: none"> <li>o spring tension on fork retainer pins and/or lock</li> <li>o damage on fork tines</li> <li>o condition of hydraulic hoses (leak, cracks, worn spots and chains (twisted or damaged)</li> <li>o parking brake tension</li> <li>o all appropriate fluid levels (add fluids when necessary)</li> <li>o condition of safety equipment (overhead guards, load backrest and extension, horn, headlights and/or rotary warning lights, seat belts, steering, foot brakes, and other applicable items)</li> <li>o pneumatic tires for proper inflation, wear, and possible damage</li> </ul>	X			
7.	Conduct the following checks after starting the equipment/vehicle:  <ul style="list-style-type: none"> <li>o back-up alarms</li> <li>o instruments and gauges for proper operating ranges and/or readings</li> <li>o hydraulic functions</li> <li>o unusual operating conditions/noises (notify supervisor immediately)</li> </ul>	ok ok ok ok			
8.	Other checks recorded on the pre-operational checklist with checkers name, date, and time specified.	X			
<b>CHECKLIST</b>		<b>SURVEILLANCE</b>			
Prepared by: D. R. Lamar 		Performed by: D. R. Lamar 			
Approved by: _____ Date: _____		Approved by: _____ Date: 8/20/99			

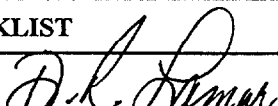
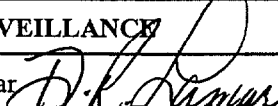
**SURVEILLANCE CHECKLIST**  
Environmental Management and Enrichment Facility

Page 3 of 4

Surveillance No.: Sur: PWT-01-99		Title: Forklift Training and Qualifications			
		Ref. Documents: PMIS-1402, "Industrial Motorized Equipment Occupational Safety & Health Act (OSHA) 29CFR 1910.178(L)			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	Comments
9.	Ensure that forklift operators carry evidence of certification/license in possession whenever operation industrial motorized equipment.	X			
10.	Ensure that routine preventative maintenance is performed as recommended by the manufacturer.	X			Preventative maintenance of leased forklifts is performed by the company leasing the equipment to USEC.
11.	Use approved load backrest extension, when required, to minimize the possibility of the load (or parts of the load) from falling rearward.	X			
12.	Set brakes or chock wheels to prevent movement of truck, trailer, or railroad car while loading or unloading.	X			
13.	When tilting the load forward or backward, perform the following:	X			
	o prevent tilting the load forward with the load-engaging means elevated except when picking up a load.	ok			
	o tilt load forward when elevated only when load is in a deposit position over a rack or stack.	ok			
	o tilt load backward only enough to stabilize the load when stacking or tiering.	ok			
<b>CHECKLIST</b>		<b>SURVEILLANCE</b>			
Prepared by: D. R. Lamar 		Performed by: D. R. Lamar 			
Approved by: _____ Date: _____		Approved by: _____ Date: 8/20/99			

**SURVEILLANCE CHECKLIST**  
Environmental Management and Enrichment Facility

Page 4 of 4

Surveillance No.: Sur: PWT-01-99		Title: Forklift Training and Qualifications			
		Ref. Documents: PMIS-1402, "Industrial Motorized Equipment Occupational Safety & Health Act (OSHA) 29CFR 1910.178(L)			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	
14.	Ensure that the following conditions do exist when parking the equipment/vehicle:	X			Reference Summary Report for details
	o within 8 feet of the center of any set of railroad tracks	ok			
	o blocking a fire aisle	ok			
	o blocking an egress door				
	o blocking access to a stairway	ok			
	o blocking fire alarm or fire fighting equipment	ok			
15.	Ensure that prior to parking (leaving unattended) that the following steps are performed:	X			
	o lower any load engaging means	ok			
	o neutralize the controls	ok			
	o shut off the power				
	o set the hand brake	ok			
	o block or chock wheels when necessary	ok			
16.	Had Pre-Task Analysis been written for the task being performed?		X		
<b>CHECKLIST</b>		<b>SURVEILLANCE</b>			
Prepared by: D. R. Lamar 		Performed by: D. R. Lamar 			
Approved by: _____ Date: _____		Approved by: _____ Date: <u>8/20/99</u>			

**Summary Report**  
Surveillance Number: Sur:WPT-01-99  
Forklift Operations

**Note:** PMIS-1402, Rev. 2, *Industrial Motorized Equipment* was the procedure used to perform this surveillance. Draft procedure FS-C-7075, *Powered Industrial Truck Training, Operation, and Maintenance* is in the review process. When the draft procedure is issued, it will replace PMIS-1402, Rev. 2. Both procedures were referenced during the surveillance; however, any discrepancies noted are against the requirement of PMIS-1402, Rev. 2.

## **4.2 Receiving Inspection**

- 4.2.2 Perform receiving inspection according to acceptance criteria provided by EMEF Procurement.
- 4.2.3 If the item is acceptable according to criteria used for receiving inspection, then affix an inspection sticker to the vehicle to indicate that the industrial Motorized equipment has passed inspection.
- 4.2.4 Identify equipment/vehicles that pass receiving inspection with a unique property number.

There are a total of fifteen forklifts assigned through USEC for use on Bechtel Jacobs projects. Twelve of the forklifts are assigned unique property numbers ("C" numbers) indicating that they were at some time accepted through receiving inspection. "C" numbers are impression stamped on metal tags and attached inside the cab of these forklifts. The numbers are also painted on the outside of each forklift.

The three leased forklifts have identifying numbers ("R" numbers) painted on the outside of them. There is no indication that any of the leased forklifts were inspected through receiving inspection. The procedure and the draft procedure do not address leased forklifts. There are no procedures documenting guidelines for receiving inspection (if necessary) or preventative maintenance on leased vehicles.

## **Pre-Task Hazard Analysis**

A drum moving operation in building C-746-A was observed as part of this surveillance. During the surveillance activities the forklift operator and the supervisor were asked if the task being observed had a pre-task hazard analysis. Both answered that the task was routine and governed by procedures and the Field Work Request (FWR). No pre-task hazard analysis was necessary. Health and Safety personnel also stated that no pre-task hazard analysis was necessary for this particular task. The procedure and the FWR provide all the necessary information concerning hazards and hazard analysis. Pre-Task

Analysis were not needed to be written on every operation or task. The procedure and FWR could suffice as a Job Hazard Analysis.

Procedure PMIS-1402, Rev.2, *Industrial Motorized Equipment* does not address pre-task hazard analysis. Draft procedure FS-C-7075, *Powered Industrial Truck and Training, Operation, and Maintenance*, which is to replace PMIS-1402, Rev 2. Section 5.10.1 states; "Ensure that an up-to-date pre-task analysis has been written in accordance with Bechtel Jacobs Company procedure SH-A-2010, *Hazard Review*. PROCEDURE SH-A-2010, Hazard review, sections A.1. states, "Pre-task Hazard Review Section B) - Required for routine work or short duration tasks that do not include significant potential hazards. Pre-task hazard reviews are not required for administrative type jobs or task where a Job Hazard Analysis already exists.

The interpretation by the forklift operator, supervisor, and Health and Safety Officer seem in conflict with the draft procedure and the hazard review procedure. If and when a pre-task hazard analysis is required needs clarification.